

1 ARAVIND SWAMINATHAN (*admitted pro hac vice*)
aswaminathan@orrick.com
2 MICHELLE VISSER (STATAE BAR NO. 277509)
mvisser@orrick.com
3 REBECCA HARLOW (STATE BAR NO. 281931)
rharlow@orrick.com
4 THOMAS FU (STATE BAR NO. 325209)
tfu@orrick.com
5 ORRICK, HERRINGTON & SUTCLIFFE LLP
The Orrick Building
6 405 Howard Street
San Francisco, CA 94105-2669
7 Telephone: +1 415 773 5700
Facsimile: +1 415 773 5759
8

Attorneys for Defendants
9 BLOCK, INC. and CASH APP INVESTING, LLC

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12

13 MICHELLE SALINAS and RAYMEL
14 WASHINGTON, individually and on behalf of
all others similarly situated,

15 Plaintiffs,

16 v.

17 BLOCK, INC. and CASH
18 APP INVESTING, LLC,

19 Defendants.
20
21
22
23
24
25
26
27
28

Case No. 3:22-cv-04823

**STIPULATION PURSUANT TO CIVIL
L.R. 6-1(B) AND [PROPOSED] ORDER
TO MODIFY CASE SCHEDULE**

Magistrate Judge: Hon. Donna M. Ryu

Pursuant to Local Rule 6-1(b), Plaintiffs Michelle Salinas and Raymel Washington and Defendants Block, Inc. and Cash App Investing, LLC, by and through the undersigned counsel, hereby stipulate and agree to the following proposed modification of the case schedule:

WHEREAS, the Complaint (ECF No. 1) was filed on August 23, 2022;

WHEREAS, a complaint was filed in an action captioned *Gordon v. Block Inc. and Cash App Investing, LLC*, No. 22-cv-6787 (N.D. Cal.) on November 2, 2022;

WHEREAS, the parties previously stipulated, and the Court approved, that the time for Defendants to answer or otherwise respond to the Complaint be extended to February 3, 2023 (ECF Nos. 22, 25, 33, 34, 39, 40);

WHEREAS, on December 6, 2022, the Court ordered that this matter and *Gordon* be related;

WHEREAS, on December 15, 2022, Defendants filed a motion to consolidate the *Salinas* and *Gordon* actions that is opposed by Plaintiff Gordon;

WHEREAS, the parties previously stipulated to continue the hearing on Defendants' motion to consolidate to the second Thursday after the parties engaged in mediation (ECF No. 50);

WHEREAS, the parties previously stipulated that if the Court grants Defendants' motion to consolidate, then the deadline for Defendants to answer or otherwise respond be continued to 30 days after the filing of a consolidated complaint (ECF No. 50);

WHEREAS, the parties previously stipulated that if the Court denies Defendant's motion to consolidate, then the deadline for Defendants to answer or otherwise respond to the Complaint be continued to 30 days after the Court's denial of the motion (ECF No. 50);

WHEREAS, the Court vacated the hearing on Defendants' motion to consolidate and set a case management conference for May 11, 2023 at 1:30 p.m. by a Zoom videoconference with updated case management conference statements due by May 4, 2023 (ECF No. 51);

WHEREAS, the parties engaged in mediation in an attempt to reach an early resolution of this action on April 24, 2023;

WHEREAS, the parties plan to continue discussions regarding the possibility of an early resolution of this action and believe the case should be stayed while the parties engage in those

discussions;

Plaintiffs and Defendants hereby stipulate that:

- The case management conference currently scheduled for May 11, 2023 be continued to July 13, 2023 at 1:30 p.m. by Zoom videoconference with updated case management conference statements due by July 6, 2023;
- The action is otherwise stayed through the completion of the case management conference.

This is the fifth extension sought by the parties to this litigation and is sought because the parties are attempting to resolve this dispute.

IT IS SO STIPULATED.

Dated: May 1, 2023

By: /s/ Michelle Visser
Michelle Visser
ORRICK, HERRINGTON & SUTCLIFFE LLP
Attorneys for Defendants
Block Inc. and Cash App Investing LLC

By: /s/ David Goodwin
David Goodwin
GUSTAFSON GLUEK PLLC

By: /s/ Scott D. Hirsch
Scott D. Hirsch
SCOTT HIRSCH LAW GROUP, PLLC

By: /s/ Gary S. Graifman
Gary S. Graifman
KANTROWITZ GOLDHAMER & GRAIFMAN, P.C.

By: /s/ Nicholas Migliaccio
Nicholas Migliaccio
MIGLIACCIO & RATHOD LLP

Attorneys for Plaintiffs

IT IS SO ORDERED.

By: _____
Hon. Jacqueline Scott Corley
U.S. DISTRICT JUDGE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Attestation re Electronic Signatures

I, Michelle Visser, attest pursuant to Northern District Local Rule 5-1(i)(3) that all other signatories to this document, on whose behalf this filing is submitted, concur in the filing's contents and have authorized this filing. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: May 1 2023

By: /s/ Michelle Visser
MICHELLE VISSER